

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN

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SUB-ZERO, INC.,  
4717 Hammersley Road  
Madison, Wisconsin 53711

and

FEDERAL INSURANCE COMPANY  
a/s/o Sub-Zero Freezer Company, Inc.  
15 Mountain View Road  
Warren, New Jersey 07061

Case No. 09-CV-497

Plaintiffs,

vs.

GENERAL ELECTRIC COMPANY  
3135 Easton Turnpike  
Fairfield, CT 05828-0001

Defendant.

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AGREED TO MOTION TO EXTEND TIME TO RESPOND TO PLAINTIFFS' COMPLAINT  
TO OCTOBER 2, 2009

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Defendant General Electric Company ("General Electric"), by and through its undersigned counsel, von Briesen & Roper, s.c., moves the Court to enlarge its time to respond to the Summons and Complaint filed in this matter.

General Electric's original deadline to respond was extended to September 25, 2009 to allow the undersigned counsel to resolve a conflict of interest and to then undertake the full representation of General Electric. The resolution of that conflict has been slowed because of the unavailability of the persons needed by the involved client due to their business and travel schedules. The undersigned understands that the conflict will be addressed and resolved in a meeting scheduled for this Thursday, September 24, 2009, if it has not been resolved prior.

General Electric respectfully requests that its deadline to respond to the Plaintiffs' summons and complaint be enlarged to October 2, 2009.

The Plaintiffs, Sub-Zero, Inc. and Federal Insurance Company, do not oppose and agree to the request made by this Motion as evidenced by their counsel's below signature.

The attached affidavit is offered in further support of this Motion.

Dated this 22nd day of September, 2009.

General Electric Company

By: s/Alan G. B. Kim, Jr.

Alan G. B. Kim, Jr.

State Bar No.: 1000672

Seth W. Goettelman

State Bar No.: 1048541

von Briesen & Roper, s.c.  
Three South Pinckney Street  
Suite 1000  
Madison, Wisconsin 53703  
Phone: (608) 441-0300  
Facsimile: (608) 441-0301

Dated this 22nd day of September, 2009.

Sub-Zero, Inc. and Federal Insurance  
Company

By: s/Michael P. Crooks

Michael P. Crooks

State Bar No.: 1008918

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and

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